The remarks made herein are responsive to the Office Action dated April 18, 2001 in the parent case, and this application is now believed to be in condition for allowance. Claims 1-8 are pending in the application and were subject to rejection under 35 USC 103, as being obvious from Corcoran et al. in view of either Venkatraman and/or Reber. Since Corcoran et al. is the main reference supporting the rejection, and Applicants have herewith provided the attached Declaration Under 37 CFR 1.131 to swear behind Corcoran et al., in addition to the comments below to traverse the rejection, the rejections under 35 USC 103 are rendered moot and Applicants respectfully request that it be withdrawn.

Please charge any additional fees or credit any overpayment to our Deposit Account No. 19-1995. A duplicate copy of this letter is enclosed for that purpose.

I. Claim Rejections – 35 USC §103(a)

The Office Action rejected **Claims 1, 2, 3, and 4** under §103(a) as being unpatentable over Corcoran. Applicants have herewith provided the attached Declaration Under 37 CFR 1.131 to swear behind Corcoran et al. Thus, Applicants respectfully submit that the rejections under 35 USC 103 are rendered moot by the Declaration, and Applicants respectfully request that the rejection be withdrawn. However, Applicants also respectfully traverse the rejection of the claims, and the modification of Corcoran in applying the Section 103 rejection.

As to **Claim 1**, Applicants respectfully traverse the Office Action's assertion that Corcoran teaches the limitations of Applicants' claimed device or renders same obvious. The

Office Action contends that Corcoran shows a method whereby a Network Browser displays four graphical buttons representing four devices from said list. Applicants have previously amended Claim 1 to more clearly emphasize the novelty and unobviousness of Claim 1 over the cited references.

In displaying the graphical object, Corcoran states that the user-interface for that device does not originate from the local system software and "instead it is loaded, as a HiPlet, from an HTTP-style universal resource locator (URL)." (Corcoran p. 1065, section 3.3, second column). Conversely, Applicants' claimed invention allows at least local access to the graphical object for controlling the desired device. Therefore, if the external network is not operating, or if the URL for the specific device is otherwise unavailable, Applicants' claimed graphical object will still be displayed in an operable fashion. Whereas Corcoran's graphical object would not function at all. Accordingly, Corcoran neither teaches nor renders obvious Applicants' claimed limitation of local access to graphical objects of the connected devices.

In addition, the Office Action admits that Corcoran does not show Applicants' claimed limitation of associating a hyper-text link to an HTML page of the specific device with the device button. However, the Office Action asserts that it would have been obvious to modify Corcoran to incorporate Applicants' claimed limitation. Applicants respectfully traverse the proposed modification of the reference.

First, it is well settled that for a modification of the prior art to be proper, the prior art itself must provide a suggestion for that modification. The Office Action states that because Corcoran suggests the use of HTML by disclosing the use of HTTP, URLs, and the name "Network Browser," that it would have been obvious to include hypertext linking to provide increased adaptability to Corcoran's disclosed system.

Applicants' respectfully traverse the Office Action's assertion of proposed suggestion by Corcoran. The HTML and URLs disclosed by Corcoran are internal components of the system that are required to download information from the device's homepage in order to make the device operable on the home network. Therefore, there would be no motivation for Corcoran to provide a separate hyper-text link as disclosed by Applicants claimed invention which would allow a user to access the HTML page of the device as the user desires.

Secondly, it would be necessary to make modifications not taught in or suggested by the prior art in order to combine the elements in the manner suggested. Corcoran mandates that the HTML page of the device be accessed in order to make the user-interface for that device functional on the network and would not need to provide a user the option of accessing the HTML page of the device as desired.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in Corcoran to achieve the claimed invention. Applicants respectfully submit that the fact that the modification produces advantages in the

increased adaptability to the device taught by <u>Corcoran</u> militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 1 because all of the elements of the claimed invention are neither disclosed nor rendered obvious, and because the proposed modifications of <u>Corcoran</u> are not suggested within the prior art.

As to **Claim 2**, the Office Action asserts that <u>Corcoran</u> shows the methods of Applicants' claimed invention. Applicants respectfully traverse this proposition and assert that since Claim 2 incorporates the novel and unobvious limitations of Claim 1, it is therefore allowable for its dependency due to the reasons set forth above in relation to the rejection of Claim 1, as well as for its own novel sub-features. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 2.

As to **Claim 3**, the Office Action asserts that <u>Corcoran</u> shows the methods of Applicants' claimed invention. Applicants respectfully traverse this proposition and assert that since Claim 3 incorporates the novel and unobvious limitations of Claim 1, it is therefore allowable for its dependency due to the reasons set forth above in relation to the rejection of Claim 1, as well as for its own novel sub-features. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 3.

As to **Claim 4**, the Office Action asserts that <u>Corcoran</u> shows the implementation of a device GUI. Applicants' respectfully traverse the Office Actions' assertion and the rejection of Claim 4. Applicants' claimed limitation requires retrieving a device ICON image from a home device, which is a limitation neither anticipated by nor rendered obvious from <u>Corcoran</u>.

As discussed above in relation to Claim 1, <u>Corcoran</u> mandates that the user-interface for a device not originate from the local system, but be provided from the home page for the device via the Internet. Applicants' Claim 4 allows the user-interface information to be retrieved from the device at least locally in addition to external networks. Accordingly, Applicants' claimed invention provides assured and secure access to the user-interface on the local network and eliminates the possible failure of the external network and interrupted access to the device. Therefore, Applicants respectfully request withdrawal of the rejection of Claim 4 because the limitations thereof are neither anticipated by nor rendered obvious from <u>Corcoran</u>.

The Office Action rejected **Claims 5 and 7** under §103(a) as being unpatentable over <u>Corcoran</u> as applied to Claim 1, and further in view of <u>Reber et al.</u> (hereinafter <u>Reber</u>). This rejection is additionally rendered moot by the submission of the attached Declaration Under 37 CFR 1.131 swearing behind <u>Corcoran</u>. However, Applicants also respectfully traverse the rejection and the modification and combination of <u>Corcoran</u> and <u>Reber</u>.

As to **Claim 5**, the Office Action contends that <u>Corcoran</u> shows displaying the user interfaces of specific devices and that it can be combined with the disclosure of <u>Reber</u> to display

a logo image. This rejection is additionally rendered moot by the submission of the attached

Declaration Under 37 CFR 1.131 swearing behind Corcoran. However, Applicants also

respectfully traverse the Office Action's interpretation of these references and this stated

combination.

First, Applicants incorporate herein the remarks set forth above as to Claim 1 in view of

Corcoran. As discussed above, the Office action admits that the Corcoran user interface is

loaded as a HiPlet from the HTTP-style URL of the devices homepage. Conversely, Applicants'

claimed invention allows the user interface for a specific device to be loaded from the local

network.

Secondly, it is well settled that for a modification or combination of the prior art to be

proper, the prior art itself must provide a suggestion for the asserted modification. The Office

Action states that because Corcoran uses an HTTP-style URL to download a user interface and

Reber teaches a method of displaying a graphical logo relating to a device onto a browser screen,

then it would have been obvious to combine the two references.

Applicants respectfully traverse the proposed combination and modification. Reber

teaches advertising on a first web page by displaying a logo of a sponsor that is linked to the web

page of the sponsor. Accordingly, because the user is already on the first web page, there would

be no reason or motivation for Reber to provide a logo of the first web page that links to itself.

Furthermore, because Corcoran already accesses the web page of the device to download

information automatically, there would be no reason to provide a logo to do so. Therefore, because of the diverse functioning of <u>Corcoran</u> and <u>Reber</u>, there would be no motivation for the combination thereof to provide a LOGO as claimed by Applicants.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in <u>Corcoran</u> and <u>Reber</u> to achieve the claimed invention. The Office Action acknowledges that Applicants' LOGO provides increased device recognition and attempts to improperly combine <u>Corcoran</u> and <u>Reber</u> to achieve the advantages thereof. Applicants respectfully submit that the fact the modification produces advantages in increasing device recognition by using a LOGO militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 5 because the combination and modification of the references is improper and does not disclose all of the claimed limitations thereof.

As to **Claim 7**, the Office Action asserts that <u>Corcoran</u> shows the importance of a manufacturers' flexibility to change and adapt the user interface. Applicants respectfully traverse the asserted rejection and the Office Action's interpretation of <u>Corcoran</u> in this manner. Applicants incorporate the remarks above set forth as to the novelty and unobviousness of Claims 1 and 5 from which Claim 7 depends. Furthermore, <u>Corcoran</u> does not show storing the

manufacturer device button in a user definable area of the device link page, a limitation of Applicants' claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejection of Claim 7.

The Office Action rejected **Claims 6 and 8** under §103(a) as being unpatentable over Corcoran as applied to Claim 1, and further in view of Venkatraman et al. (hereinafter Venkatraman). This rejection is additionally rendered moot by the submission of the attached Declaration Under 37 CFR 1.131 swearing behind Corcoran. However, Applicants also respectfully traverse the rejection, the modification and combination of Corcoran and Venkatraman, and the interpretation thereof.

As to **Claim 6**, Applicants incorporate herein the remarks above set forth as to Claim 1 in view of Corcoran, in furtherance of which, the Office action acknowledges that the user interface is loaded as a HiPlet from the HTTP-style URL of the device homepage. Conversely, Applicants' claimed invention allows the user interface for a specific device to be at least loaded from the local network.

Secondly, it is well settled that for a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion therefor. Neither Corcoran nor Venkatraman suggests that the references be combined or modified in the manner proposed by the Office Action.

Thirdly, <u>Venkatraman</u> does not show all of the limitations of Applicants claimed invention. In fact, <u>Venkatraman</u> teaches away from Applicants' claimed invention by requiring that "A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the devices 10 and 50-52 into the corresponding web browser application." (<u>Venkatraman</u>, Column 7, lines 36-38)

Conversely, Applicants' claimed invention provides a session manager that determines the location and availability of the devices connected to the network in a dynamic fashion. Accordingly, even if the combination were legally justified, it would not teach all the limitations of Applicants claimed invention because the method of receiving a URL from a home device is admittedly not taught by <u>Corcoran</u>.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in <u>Corcoran</u> and <u>Venkatraman</u> to achieve the claimed invention. The Office Action admits that Applicants' method of providing of a URL associated with the device provides increased information selectivity. However, the Office Action then attempts to improperly combine <u>Corcoran</u> and <u>Venkatraman</u> to achieve the advantages thereof.

Applicants respectfully submit that the fact the modification produces admitted advantages militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. In addition, because <u>Corcoran</u> mandates that the device information be directly downloaded from

the home page of the device, there would be no motivation for providing a separate URL therefor.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 6 because the combination and modification of the references is improper and does not disclose all the limitations thereof.

As to **Claim 8**, Applicants incorporate herein the remarks above set forth as to <u>Corcoran</u>, in furtherance of which, the Office action acknowledges that the user interface is loaded as a HiPlet from the HTTP-style URL of the devices homepage. Conversely, Applicants' claimed invention allows the user interface for a specific device to be at least loaded from the local network.

Secondly, it is well settled that for a modification or combination of the prior art to be proper, the prior art itself must provide a suggestion therefor. Neither <u>Corcoran</u> nor <u>Venkatraman</u> suggests that the references be combined or modified as proposed by the Office Action.

Thirdly, <u>Venkatraman</u> does not teach all the limitations of Applicants claimed invention. In fact, <u>Venkatraman</u> teaches away from Applicants' claimed invention by requiring that "A user of one of the computer systems 90-92 enters a URL corresponding to the desired one of the

devices 10 and 50-52 into the corresponding web browser application." (Venkatraman, Column 7, lines 36-38)

Conversely, Applicants' claimed invention provides a session manager that determines the location and availability of the devices connected to the network in a dynamic fashion. Accordingly, even if the combination were legally justified, it would not teach all the limitations of Applicants claimed invention because the method of receiving a URL from a home device is admittedly not shown within Corcoran.

Finally, the Office Action seems to recognize the advantages of the presently claimed invention by trying to make modifications in Corcoran and Venkatraman to achieve the claimed invention. The Office Action admits that Applicants' method of providing of a URL from a properties file located on a home device allows itemized information gathering and provides increased space efficiency and attempts to improperly combine Corcoran and Venkatraman to achieve the advantages thereof.

Applicants respectfully submit that the fact the modification produces advantages in information gathering and storage space efficiency militates in favor of the patentability of Applicants claimed invention because it proves that the combination produces new and unexpected results and hence is unobvious. In addition, because Corcoran mandates that the device information be directly downloaded from the home page of the device, there would be no motivation for providing a separate URL therefor.

Therefore, Applicants respectfully request withdrawal of the rejection of Claim 8 because the combination and modification of the references is improper and does not disclose all the limitations thereof.